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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
MANCHESTER INC., NICE CARS FUNDING, LLC,	:	<u>ECF CASE</u>
NICE CARS ACCEPTANCE ACQUISITIONCO, INC.	:	
AND NICE CARS OPERATIONS	:	
ACQUISITIONCO, INC.,	:	07 Civ. 8659 (LTS)
	:	
Plaintiffs,	:	NOTICE OF MOTION
	:	
v.	:	Oral Argument Requested
	:	
RAY LYLE, VICTORIA LYLE, GINGER BOND,	:	
RAY LYLE II, ROBERT LYLE, AND	:	
LEEDOM & ASSOCIATES, LLC,	:	
	:	
Defendants.	:	
-----X	:	

PLEASE TAKE NOTICE that upon the Declaration of Richard T. Marooney, dated January 18, 2008, and the Second Amended Complaint annexed thereto, and the accompanying Memorandum of Law, the undersigned hereby moves this Court before the Honorable Laura Taylor Swain, United States District Judge, in Room 17C of the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for an order dismissing the Second Amended Complaint against defendant Leedom & Associates, LLC with prejudice pursuant to Rules 8, 9(b) and 12(b)(6) of the Federal Rules of Civil Procedure and the Private Securities

Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(b)(1) and (2), and for such other and further relief as the Court may deem just and proper.

Pursuant to Rule 2(B) of the Individual Practices of Judge Laura Taylor Swain ("Individual Practices"), counsel for defendant Leedom & Associates, LLC hereby confirms that it has used its best efforts to resolve the above captioned matter by contacting plaintiffs' counsel by letter and telephone. This motion remains necessary given plaintiffs' intent to press these claims.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 2(J) of the Individual Practices, defendant respectfully requests oral argument on this motion at an appropriate date and time to be determined by the Court.

Dated: New York, New York
January 18, 2008

By:

/s/ Richard T. Marooney
Richard T. Marooney (RM-0276)
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To: Attached